

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**DEFENDANT GOOGLE LLC'S NOTICE OF  
MOTION TO RETAIN DOCUMENTS UNDER SEAL**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Declaration of Sara B. Tomezsko and exhibit, and Declaration of Frank Wagner (ECF 174), Defendant Google LLC, through its undersigned counsel, hereby moves this Court, before the Honorable Lorna G. Schofield, at the United States District Court, 500 Pearl Street, Room 6B, New York, New York 10007, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, the Stipulated Protective Order for the Treatment of Confidential Information dated February 4, 2020 (ECF 23), and the Court's Individual Rules and Procedures for Civil Cases, Rule I.D for an Order permitting it to retain under seal a certain document submitted in connection with Plaintiff's Reply in Further Support of her Motion for Summary Judgment filed on January 26, 2022 (ECF 206), pursuant to the Court's December 28, 2021, Order (ECF 194).

PLEASE TAKE FURTHER NOTICE that, Plaintiff's opposition, if any, shall be due on February 11, 2022, and Google's reply due February 18, 2022.

Dated: Jersey City, New Jersey  
January 28, 2022

PAUL HASTINGS LLP

A handwritten signature in black ink, appearing to read 'K. W. Gage', is written over a horizontal line.

By: Kenneth W. Gage  
Sara Tomezsko


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*Attorneys for Defendant*  
GOOGLE LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on this January 28, 2022, I caused a true and exact copy of the foregoing DEFENDANT GOOGLE LLC'S NOTICE OF MOTION TO RETAIN DOCUMENTS UNDER SEAL, MEMORANDUM OF LAW, the accompanying DECLARATION OF SARA B. TOMEZSKO, and PROPOSED ORDER to be filed electronically and served by mail on anyone unable to accept electronic filing. Notice and copies of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

Dated: Jersey City, New Jersey  
January 28, 2022

  
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Sara B. Tomezsko